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6 Plaintiff in Pro Per

7 UNITED STATES DISTRICT COURT
8
9 CENTRAL DISTRICT OF CALIFORNIA

10 MARC WOLSTENHOLME,
11 Plaintiff,
12 vs.
13 RIOT GAMES, INC.,
14 Defendant

CASE NO. 2:25-CV-00053-FMO-BFM HON.

Hon. Fernando M. Olguin

DECLARATION OF MARC
WOLSTENHOLME

PLAINTIFF'S EXHIBIT Y: AI-ASSISTED
ADAPTATION OF BLOODBORG INTO
ARCANE

15
16 Dated this: March 4, 2025

M. WOLSTENHOLME.

[MARC WOLSTENHOLME]

1 **EXHIBIT Y: AI-ASSISTED ADAPTATION OF BLOODBORG INTO**
2 **ARCANE**

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4 **I. INTRODUCTION**

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7 This exhibit provides compelling evidence that Arcane may have been developed
8 using an AI-assisted transformation of Bloodborg material. Given the extensive similarities
9 between the two works, along with inconsistencies in Arcane’s development timeline and
10 showrunner statements, the Plaintiff asserts that it is likely that Riot Games employed an AI
11 system to extract themes, structures, and narratives from Bloodborg while slightly modifying
12 elements to mask direct copying.
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15 **II. KEY EVIDENCE SUGGESTING AI TRANSFORMATION**

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18 *1. Thematic & Structural Replication*

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20 **Bloodborg:** Trauma-driven cyberpunk dystopia with elite vs. underworld conflict.

21
22 **Arcane:** Identical themes, yet lacking the depth of trauma exploration evident in
23 Bloodborg.
24

2. Symbolic Iconography

Bloodborg: The Eye & Quantum Consciousness - deeply tied to IO-CU theory.

Arcane: Purple Eye Symbolism - used heavily but lacks clear explanation and understanding.

3. Biomechanical & Blood-Based Augmentation

Bloodborg: Blood-drug evolution into Bloodborgs.

Arcane: Viktor's Hextech blood infusion & Warwick's transformation into Bloodborgs.

4. Shimmer vs. Blood-Drug System

Bloodborg: Blood-extraction-based economy & experimentation.

Arcane: Shimmer mutation system with near-identical properties.

1 *5. AI-Controlled Drones & Robotics*

2
3 **Bloodborg:** Bee drones and Air-blades- autonomous attack and repair drones.
4

5
6 **Arcane:** Butterfly drones and Powder's monkey bombs—AI-driven combat tools.
7

8 *6. House of Cards Symbolism*

9
10 **Bloodborg:** Warwick snapping a finger as a metaphor for collapse.
11

12
13 **Arcane:** Silco knocking over a house of cards in a veiled threat.
14

15 *7. Bridge Trauma Scene*

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17 **Bloodborg:** The Great Bridge Dumping - key origin trauma event.
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20 **Arcane:** Vi & Jinx's parental loss on a bridge during a violent conflict.
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2 *8. Bio-Experimentation & Mutants*

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5 **Bloodborg:** Genetic enhancements, body modifications, and controlled
6 mutations.

7
8 **Arcane:** Rio's forced mutation & Warwick's impending transformation.

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11 *9. Geographic Divide of Two Cities*

12
13 **Bloodborg:** New Kowloon vs. The Smoglands below layered against The
14 Assemblage.

15
16 **Arcane:** Piltover vs. Zaun, layered against Ambessa's Noxus mutated army in
17 season 2
18

1 **III. LEGAL BASIS FOR AI-ASSISTED COPYRIGHT INFRINGEMENT**

2 **CLAIM**

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4 1. Substantial Similarity Test

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7 Under Feist Publ'ns, Inc. v. Rural Tel. Serv. Co., 499 U.S. 340 (1991), copyright
8 infringement requires:

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10 Access: Riot Games had access to Bloodborg before Arcane's finalization.

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12
13 Substantial Similarity: Direct overlap of protected expressions across themes,
14 settings, and character arcs.

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16 2. Non-Existence in Original League of Legends Lore

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18
19 Many elements central to Arcane (Shimmer, blood-drug mutation, thematic
20 trauma writing) are not present in League of Legends prior to Arcane's release.

3. AI-Assisted Plagiarism & Copyright Law

AI can be used to transform copyrighted works in a way that masks direct copying. However, if substantially similar expressions remain intact, it still constitutes infringement (Williams v. Gaye, 885 F.3d 1150 (9th Cir. 2018)).

4. Discovery Requests

To establish whether Riot Games utilized AI tools to convert Bloodborg into Arcane, Plaintiff requests:

Internal Riot AI Development Records

Script Revision Logs & Metadata

Writer Communications Concerning Narrative Adaptation

Pre-Production Drafts for Character & Scene Development

1 **IV. CONCLUSION**

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3 Plaintiff asserts that Arcane did not originate as an organic League of Legends
4 adaptation but was instead derived-via AI processing- from Bloodborg. This exhibit supports:
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6
7 Strong grounds for discovery into Riot's internal writing process.
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9 A foundation for a copyright infringement claim based on modified but
10 substantially similar expressions.
11

12
13 A request for full disclosure of Riot Games' AI-assisted content adaptation
14 practices.
15

16 Plaintiff reserves the right to amend this exhibit based on additional discovery
17 evidence.
18

Declaration

I, Marc Wolstenholme, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Respectfully Submitted,

Dated: March 4, 2025, Marc Wolstenholme

Plaintiff, Pro Se *M. WOLSTENHOLME*